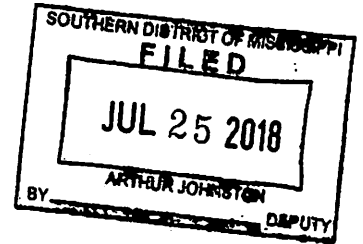


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:18-cr-146-CWR-FKB**

CODY CLINES ADKINS

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(a)(4)(B) & (b)(2)

The Grand Jury charges:

COUNT 1

On or about June 29, 2008, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 4 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a)

COUNT 2

On or about August 25, 2008, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 4 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 3

On or about October 7, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 7 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or

which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 4

On or about October 10, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 7 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 5

On or about October 14, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 7 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means

or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 6

On or about April 5, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 11 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 7

On or about October 14, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Girl A, who was then approximately 7 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 8

On or about April 18, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Male A, who was then approximately 2 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign

commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 9

On or about April 19, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Male A, who was then approximately 2 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 10

On or about May 16, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Male A, who was then approximately 2 years old, to engage in sexually explicit conduct, for the purpose of producing one or more visual

depictions of such conduct, as defined in Title 18, United States Code, Section 2256, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 11

On or about May 17, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did employ, use, persuade, induce, entice, and coerce Minor Male A, who was then approximately 2 years old, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, for the purpose of producing one or more visual depictions of such conduct, knowing or having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 12

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Dell Studio XPS computer, with Western Digital hard drive, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section, 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 13

That on or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed an OCZ Trion 1500 SSD drive, containing one or more file images, in digital still or

video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 14

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Seagate laptop hard drive, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section, 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 15

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or

transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed an Apple iPhone 6S mobile phone, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code Section, 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 16

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Seagate Barracuda hard drive, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 17

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Seagate Momentus hard drive, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 18

On or about April 3, 2017, in Hinds County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **CODY CLINES ADKINS**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a SanDisk 16 GB SDHC media card, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use

of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

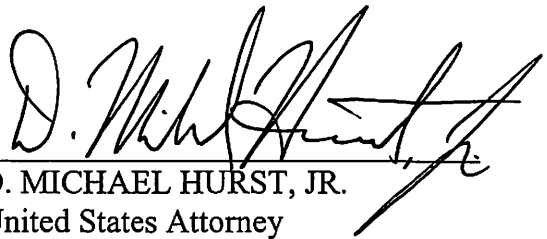
As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offenses alleged in this indictment:

- (1) Dell Studio XPS computer, service tag # DRP8NL1;
- (2) Western Digital hard drive, S/N WMATV 4919593;
- (3) OCZ Trion 1500 SSD drive, S/N A22Q3091605006459;
- (4) Toshiba External hard drive, S/N 24MHK8UAFSAA;
- (5) Sabrent External hard drive, S/N S1CUNYAF102376;
- (6) Seagate laptop thin hard drive, 500 GB, S/N S3PCQE08;
- (7) Apple iPhone 6S, Model A1634;
- (8) Seagate Barracuda hard drive, 500 GB, S/N W2A204L3;
- (9) Seagate Monentus hard drive, 160 GB, S/N 5SV54X27;
- (10) SanDisk 16 GB SKHC media card; and
- (11) Patriot 32 GB SD card.

Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice of any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 2253.


D. MICHAEL HURST, JR.
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on the 25th day of July, 2018.


UNITED STATES MAGISTRATE JUDGE